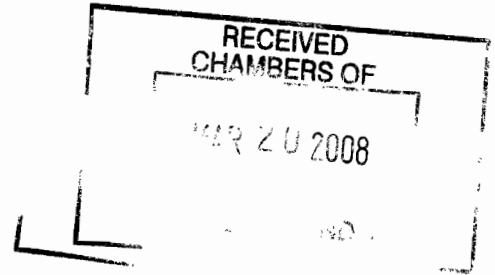


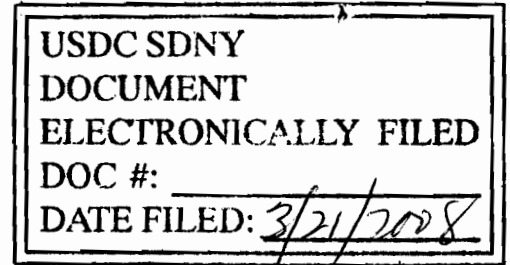
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March 20, 2008

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Honorable Shira A. Scheindlin
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007



Re: SOL Control SRL *et ano*
v. M/V MSC REGINA *et al.*
07 Civ. 9506(SAS)
Our File: 7R-1566

Dear Judge Scheindlin:

I represent the plaintiffs in this admiralty action which involves a claim for alleged cargo loss. Despite the good faith efforts of all counsel, it has not been possible to complete discovery and other trial preparations in the time period previously anticipated. Accordingly, all parties join in respectfully requesting a sixty-day extension of the discovery and other deadlines as set forth below. This is the first application for a modification of the case management deadlines.

This action involves a containerized shipment of computer equipment transported from Miami to Asuncion, Paraguay. Because of the prospective expense of conducting depositions in the load and discharge ports, counsel have proceeded in the first instance with documentary discovery. Despite the discovery conducted to date, there remain certain factual issues which counsel are attempting to narrow, in particular with respect to events at the port of discharge. Counsel are also in communication with the assigned magistrate judge's chambers concerning settlement conference scheduling. The intention of counsel is to use the additional time to also fully explore settlement avenues.

Counsel join in respectfully requesting following adjustment of the case management deadlines:

Honorable Shira A. Scheindlin
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Expert reports to be exchanged by.....May 12, 2008

Experts to be deposed by.....May 28, 2008

Discovery to be completed by.....June 6, 2008

Plaintiffs to supply pre-trial order
matters to defendants.....June 27, 2008

Pre-trial order, trial brief and proposed
findings of fact and conclusions of law.....July 21, 2008

April 7, 2008 final pretrial conference
rescheduled for..... June 18 at 4³⁰

Counsel join in thanking the Court for its attention and indulgence and remain at
the Court's disposition in the event that additional information is required.

*Revised schedule set forth
above is hereby so ordered.*

Respectfully,

[Signature]
David L. Mazaroli

cc: Kennedy Lillis Schmidt & English
Attn.: Thomas Grasso, Esq. (Via e-mail: tgrasso@klselaw.com)

*no further
extensions*

Lyons & Flood LLP
Attn.: Edward P. Flood, Esq. (Via e-mail: eflood@lyons-flood.com)

[Signature]
used
3/20/08